

BONSIGNORE TRIAL LAWYERS, PLLC

TRIAL LAWYERS
www.classactions.us
23 FOREST STREET
MEDFORD, MA 02155

OFFICE: (781) 350-0000
rbonsignore@classactions.us

Facsimile: (702) 983-8673
Cellphone: (781) 354-1800

July 21, 2023

VIA ECF

Honorable Judge Jon S. Tigar
Oakland Courthouse,
Courtroom 6 – 2nd Floor
1301 Clay Street
Oakland, CA 94612

Re: In re: Cathode Ray Tube (CRT) Antitrust Litigation
Case No. 07-cv-05944-JST, Case No. 08-01559-JST

Dear Judge Tigar:

We are writing this letter, with respect, as counsel for the Massachusetts Indirect Purchaser Plaintiffs (“Massachusetts IPP”) to advise that we have fully resolved the issues with LG Electronics, Inc., et al, (“LGE”) raised by the Court in its May 25, 2023 Order (ECF 6201).

To provide further context, Massachusetts IPP’s counsel inadvertently included LGE as defendants in a proposed amended complaint (despite those parties having previously been dismissed) as a result of a drafting error. Thereafter, we advised LGE’s counsel the matter would be corrected, but no follow up formal steps were taken toward that end. Thereafter, LGE wasted resources on filings when a revised proposed complaint was not filed. As a result of this and other failures, the Court subsequently granted LGE’s motion for sanctions and instructed the parties to “meet and confer” to resolve the sanctions related issues.

Counsel for Massachusetts IPP and Counsel for LGE have since then met and conferred and agreed upon an appropriate remedy. A relevant stipulation reflecting the aforementioned agreement was filed by counsel for Massachusetts IPP and Counsel for LGE. *See* ECF No. 6218.

In connection with amicably resolving this issue, we wanted your Honor to know that Massachusetts IPP counsel took the ruling to heart and deeply regret having failed to follow through on the initial approach and in making other mistakes, including assuming no further filing was necessary because Massachusetts IPPs represented they were no longer pursuing an amendment to add LGE as a party. Plaintiffs’ counsel wish that this unfortunate circumstance had not occurred and have taken steps to ensure these mistakes will never occur again.

Therefore, and resulting from the parties’ amicable resolution of this matter with complete seriousness, Massachusetts IPP counsel and counsel for LGE filed a stipulation (ECF No. 6218),

motion (ECF No. 6219), and proposed order (ECF No. 6201). seeking to have the Court vacate its prior Sanctions Order by agreement.

Thank you for your attention to this matter.

Very truly yours,

/s/ Robert Bonsignore
Robert J. Bonsignore

/s/ Joseph Alioto
Joseph Alioto

Counsel for Massachusetts IPPs